

# EXHIBIT 1

**From:** Joy Odom <joyodom@quinnemanuel.com>  
**Sent:** Wednesday, January 25, 2017 4:11 PM  
**To:** Dingman, Michael S.; Hanes, Grayson P.; deBettencourt, Justin D.  
**Cc:** Ariel Trajtenberg  
**Subject:** Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Mike and Justin,

Plaintiffs intend to move to strike Mr. Caruso's report from the summary judgment record and to preclude him from testifying at trial on Rule 702 and 403 grounds. Please let us know if you will agree to withdraw Mr. Caruso's report from summary judgment and not to call him at trial.

If you do not agree, please let us know if you are available for oral argument on this motion on Friday, February 17. I am available to discuss this afternoon if you believe it would be productive.

Thanks,

Joy

**Joy Odom**

Associate | Quinn Emanuel Urquhart & Sullivan, LLP  
777 6th Street, NW, 11th Floor  
Washington, D.C. 20001  
202-538-8159 Direct  
202.538.8000 Main Office Number  
202.538.8100 FAX  
[joyodom@quinnemanuel.com](mailto:joyodom@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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